

FILED

1/28/2021 B;

**TH AS G. BRUTON
CLERK, U.S. DISTRICT COURT**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

**DEXSTIN BRYANT,
also known as "Dex,"
TREMAINE BRENT,
also known as "Bud,"
JOHNNIE GRANT,
also known as "Johnno,"
TEVIN ALVERIO,
also known as "Tevo,"
JARVIS BLAIR,
SHAUNTRELL HARRIS,
also known as "Trell,"
ENRIQUE HOLLINS,
also known as "Rique,"
SHARONDA HOSEY,
also known as "Ronda,"
JUSTIN JOHNSON,
also known as "BB,"
TYJUAN MCDOWELL,
also known as "Weezy,"
RIKITA MITCHELL,
ALLEN WASHINGTON,
also known as "Peanut,"
PAUL WILKINS,
INA WILLIAMS,
WONSHON DONAHUE,
OSHAY KELLEY, and
DOROTHY WILLIAMS**

Violations: Title 21, United States
Code, Sections 846 and 841(a)(1);
Title 18, United States Code,
Sections 922(g)(1), 924(c)(1)(A), and
2

20 CR 577

SUPERSEDING INDICTMENT

**JUDGE DOW JR.
MAGISTRATE JUDGE VALDEZ**

COUNT ONE

The SPECIAL JANUARY 2020 GRAND JURY charges:

1. From in or around April 23, 2020 and continuing through in or around September 1, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEXSTIN BRYANT, also known as "Dex,"
TREMINE BRENT, also known as "Bud,"
JOHNNIE GRANT, also known as "Johnno,"
TEVIN ALVERIO, also known as "Tevo,"
JARVIS BLAIR,
SHAUNTRELL HARRIS, also known as "Trell,"
ENRIQUE HOLLINS, also known as "Rique,"
SHARONDA HOSEY, also known as "Ronda,"
JUSTIN JOHNSON, also known as "BB,"
TYJUAN MCDOWELL, also known as "Weezy,"
RIKITA MITCHELL,
ALLEN WASHINGTON, also known as "Peanut,"
PAUL WILKINS,
INA WILLIAMS,
WONSHON DONAHUE,
OSHAY KELLEY, and
DOROTHY WILLIAMS

defendants herein, did conspire with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

2. With respect to DEXSTIN BRYANT, TREMAINE BRENT, and JOHNNIE GRANT, the offense involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

3. With respect to TEVIN ALVERIO, JARVIS BLAIR, SHAUNTRELL HARRIS, ENRIQUE HOLLINS, SHARONDA HOSEY, JUSTIN JOHNSON, TYJUAN MCDOWELL, RIKITA MITCHELL, ALLEN WASHINGTON, PAUL WILKINS, and INA WILLIAMS, the offense involved 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

4. With respect to WONSHON DONAHUE, OSHAY KELLEY, and DOROTHY WILLIAMS, the offense involved a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl]

propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

5. Before defendant DEXSTIN BRYANT committed the offense charged in Count One, DEXSTIN BRYANT had a final conviction for a serious drug felony, namely, manufacture/delivery of cocaine, in violation of 720 ILCS 570/401(C)(2), in the Circuit Court of Cook County, Illinois, Docket No. 11 CR 0431401, for which the defendant served a term of imprisonment of more than 12 months, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

6. Before defendant JOHNNIE GRANT committed the offense charged in Count One, JOHNNIE GRANT had a final conviction for a serious drug felony, namely, delivery of controlled substance, in violation of 720 ILCS 570/401(d)(1), in the Circuit Court of Cook County, Illinois, Docket No. 12 CR 1162401, for which the defendant served a term of imprisonment of more than 12 months, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

7. Before defendant JUSTIN JOHNSON committed the offense charged in Count One, JUSTIN JOHNSON had a final conviction for a serious violent felony, namely, aggravated vehicular hijacking, in violation of 720 ILCS 5/18-3, in the Circuit Court of Cook County, Illinois, Docket No. 16 CR 1242302, for which the defendant served a term of imprisonment of more than 12 months.

8. Before defendant PAUL WILKINS committed the offense charged in Count One, PAUL WILKINS had a final conviction for a serious drug felony, namely, manufacture/delivery of heroin, in violation of 720 ILCS 570/401(c)(1), in the Circuit Court of Cook County, Illinois, Docket No. 13 CR 1419401, for which the defendant served a term of imprisonment of more than 12 months, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT TWO

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 12, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARONDA HOSEY, also known as "Ronda,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 13, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

INA WILLIAMS and,
TYJUAN MCDOWELL, also known as "Weezy,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 15, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TEVIN ALVERIO, also known as "Tevo,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 16, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

JUSTIN JOHNSON,
also known as "BB,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 23, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

OSHAY KELLEY,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 24, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JUSTIN JOHNSON,
also known as "BB,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 25, 2020, at approximately 11:54 a.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JUSTIN JOHNSON,
also known as "BB,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 25, 2020, at approximately 6:47 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JUSTIN JOHNSON,
also known as "BB,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 27, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TYJUAN MCDOWELL,
also known as "Weezy,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ELEVEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about June 29, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARONDA HOSEY, also known as "Ronda,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about July 4, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

SHARONDA HOSEY, also known as “Ronda,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about July 6, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JUSTIN JOHNSON,
also known as "BB,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOURTEEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about July 13, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

TYJUAN MCDOWELL,
also known as "Weezy,"

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely a mixture and substance containing a detectable amount of fentanyl (N-
phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled
Substance, and a mixture and substance containing a detectable amount of heroin, a
Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTEEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 5, 2020, at approximately 4:10 p.m., Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALLEN WASHINGTON,
also known as "Peanut,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 5, 2020, at approximately 5:03 p.m., Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TYJUAN MCDOWELL,
also known as "Weezy," and,
ALLEN WASHINGTON,
also known as "Peanut,"

defendants herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 6, 2020, at approximately 12:23 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

PAUL WILKINS and
DOROTHY WILLIAMS,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 6, 2020, at approximately 1:14 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

PAUL WILKINS and
DOROTHY WILLIAMS,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT NINETEEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 6, 2020, at approximately 5:31 p.m., at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

PAUL WILKINS and
DOROTHY WILLIAMS,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 11, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNIE GRANT,
also known as "Johnno,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-ONE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 11, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

RIKITA MITCHELL and
JARVIS BLAIR,

defendants herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 12, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

PAUL WILKINS,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-THREE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 13, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JUSTIN JOHNSON,
also known as "BB,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FOUR

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 25, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

ENRIQUE HOLLINS,
also known as "Rique,"

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-FIVE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about September 1, 2020 at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARVIS BLAIR,

defendant herein, did knowingly possess with intent to distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SIX

The SPECIAL JANUARY 2020 GRAND JURY further charges:

1. On or about September 1, 2020 at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNIE GRANT,
also known as "Johnno,"

defendant herein, did knowingly possess, with intent to distribute, a controlled substance, namely 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, and 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before defendant JOHNNIE GRANT committed the offense charged in Count One, JOHNNIE GRANT had a final conviction for a serious drug felony, namely, delivery of controlled substance, in violation of 720 ILCS 570/401(d)(1), in the Circuit Court of Cook County, Illinois, Docket No. 12 CR 1162401, for which the defendant served a term of imprisonment of more than 12 months, and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT TWENTY-SEVEN

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about September 1, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNIE GRANT,
also known as "Johnno,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, (i) a Smith & Wesson, model M & P Shield, 9 millimeter pistol, bearing serial number JEP4751; (ii) a Walther, model Creed, 9 millimeter pistol, bearing serial number FCRI061; and (iii) a loaded Smith & Wesson, model M & P Shield, 9 millimeter pistol, bearing serial number RDP8774, which firearm had traveled in interstate commerce prior to defendant's possession of it;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-EIGHT

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about September 1, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHNNIE GRANT,
also known as "Johnno,"

defendant herein, did knowingly possess a firearm, namely, (i) a Smith & Wesson, model M & P Shield, 9 millimeter pistol, bearing serial number JEP4751; (ii) a Walther, model Creed, 9 millimeter pistol, bearing serial number FCRI061; and (iii) a Smith & Wesson, model M&P Shield, millimeter pistol, bearing serial number RDP8774, in furtherance of a drug trafficking crime for which defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Twenty Six of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWENTY-NINE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about August 29, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

SHAUNTRELL HARRIS,
also known as "Trell,"

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely a mixture and substance containing a detectable amount of fentanyl (N-
phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled
Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about September 3, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

SHAUNTRELL HARRIS,
also known as "Trell,"

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely a mixture and substance containing a detectable amount of fentanyl (N-
phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled
Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-ONE

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about January 8, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WONSHON DONAHUE,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-TWO

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about February 4, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

WONSHON DONAHUE,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2020 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Section 841 as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. In addition, defendant shall forfeit to the United States of America, any firearm, magazine, and ammunition involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 1461(c);

3. The property to be forfeited includes, but is not limited to:

- a. \$6,450 in United States Currency;
- b. a Smith & Wesson, model M & P Shield, 9 millimeter pistol, bearing serial number JEP4751, and associated ammunition;
- c. a Walther, model Creed, 9 millimeter pistol, bearing serial number FCRI061, and associated ammunition;
- d. a Smith & Wesson, model M & P Shield, 9 millimeter pistol, bearing serial number RDP8774, and associated ammunition;
- e. three firearm magazines;
- f. ammunition; and

g. the telephone number (312) 447-4490

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

Signed by Timothy J. Storino on behalf of the
UNITED STATES ATTORNEY